

EXHIBIT A

(Proposed Scheduling Order)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream TV Networks, Inc.,¹

Debtor.

Chapter 11

Bky. No. 23-10763 (MDC)

In re:

Technovative Media, Inc.,

Debtor.

Chapter 11

Bky. No. 23-10764 (MDC)

(Jointly Administered)

STREAM TV NETWORKS, INC. and
TECHNOVATIVE MEDIA, INC.,

Debtors,

v.

Adv. No. 23-00057

SHADRON L. STASTNEY, SLS HOLDINGS
VI, LLC, HAWK INVESTMENT HOLDINGS
LIMITED, ARTHUR LEONARD ROBERT
"BOB" MORTON, SEECUBIC, INC.,
ALASTAIR CRAWFORD, KRZYSZTOF
KABACINSKI, KEVIN GOLLOP, ASAF
GOLA, JOHN DOE(S), JANE DOE(S),
DELAWARE and OTHER LAW FIRMS
representing and acting in concert with John
Doe(s) and/or Jane Doe(s), INVESTMENT
BANKS employed by John Doe(s) and/or Jane
Doe(s), PATRIC THEUNE, and SEECUBIC
B.V.,

Defendants.

¹ The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (...4092) and Technovative Media, Inc. (...5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

CASE MANAGEMENT PLAN AND SCHEDULING ORDER

MAGDELINE D. COLEMAN, Chief United States Bankruptcy Judge:

This Civil Case Management Plan and Scheduling Order is submitted by Stream TV Networks, Inc. and Technovative Media, Inc. (the “Plaintiffs”) in accordance with Federal Rule of Bankruptcy Procedure 7026 and Federal Rule of Civil Procedure 26(f)(3):

1. This Case Management Plan and Scheduling Order shall apply in the above-captioned adversary proceeding.
 - a. The term “Complaint” as used herein shall mean the complaint filed in the above-captioned adversary proceeding.
 - b. The term “Defendants” as used herein shall mean the defendants in the above-captioned adversary proceeding, except for those defendants against whom Plaintiffs are pursuing defaults as a result of their failure to plead or otherwise defend against the Complaint. As of the date of filing this Civil Case Management Plan and Scheduling Order, two (2) Defendants (all residing outside of the United States) have not yet been served. Plaintiffs are pursuing service through the Hague Convention or other applicable procedures.
2. Defendants shall have until November 15, 2023 to answer, move against, or otherwise respond to the Complaint. The discovery planning conference described in **Fed. R. Civ. P. 26(f)**, made applicable by **Fed. R. Bankr. P. 7026**, occurred on October 27, 2023.
3. The schedule for the briefing of any motions to dismiss shall be as follows:
 - a. Moving briefs due November 15, 2023;
 - b. Oppositions due December 6, 2023; and
 - c. Replies due December 20, 2023.
4. The following discovery and pretrial schedule shall apply absent further agreement of the Parties or order of the Court.
 - a. Initial Disclosures. Each party shall serve its initial disclosures required by Rule 26(a)(1) (BR 7026) no later than November 17, 2023.

b. Fact Discovery.

- i. The parties may serve document requests pursuant to Rule 34 (BR 7034), interrogatories pursuant to Rule 33 (BR 7033), requests for admissions pursuant to Rule 36 (BR 7036) and other requests for written discovery on or after October 27, 2023.
- ii. The parties may serve on non-parties subpoenas for documents pursuant to Rule 45 (BR 9016) on or after October 27, 2023.
- iii. The parties shall substantially complete their production of documents in response to document requests served on or before March 22, 2024, by April 19, 2024 (it being understood that Parties will produce responsive materials on a rolling basis in advance of such date).
- iv. Deposition notices shall be served no less than 14 days prior to the deposition date. Plaintiffs and Defendants shall each be entitled to take a total of 20 depositions of fact witnesses.
- v. Fact discovery shall be completed by April 19, 2024.

c. Expert Discovery.

- i. Plaintiffs' initial expert reports shall be served by April 19, 2024.
- ii. Defendants' expert reports—including rebuttal reports in response to Plaintiffs' initial expert reports and expert reports on a subject not addressed in Plaintiffs' initial expert reports—shall be served by May 17, 2024.
- iii. In the event that Defendants' experts reports address a subject not addressed in Plaintiffs' initial expert reports, Plaintiffs may serve a rebuttal expert report in response thereto by June 14, 2024.
- iv. All expert reports must satisfy the requirements of Federal Rule of Civil Procedure 26 (BR 7026).
- v. Expert depositions shall be completed by July 12, 2024.

d. Summary Judgment Motions.

- i. Motions for summary judgment shall be due September 18, 2024.
- ii. Oppositions to motions for summary judgment shall be due October 16, 2024.
- iii. Replies in support of summary judgment shall be due November 13, 2024.

5. Any motion to amend or to join additional parties shall be filed no later than July 19, 2024.

6. General Deadline for Filing Response or Objection to Motion. Except as provided in L.B.R. 9014-2 and subdivision (i), a response or objection to a motion shall be filed and served on the movant, or if the movant is represented, counsel for the movant, no later than 14 days after the date on which the movant serves the motion.

7. Mediation. Plaintiffs and the Defendants shall confer regarding appointment of a mediator, and on or before November 22, 2024, shall file a stipulation regarding appointment of mediator. If the parties fail to file such a stipulation by this date, the parties shall request a status conference with the Court to resolve the dispute. The parties shall meet and confer concerning procedures for the mediation. Unless otherwise agreed by the parties, the mediation shall be governed by Local Rule 9019-5. Local Rule 9019-5(j) shall not apply to the mediation in this matter.

8. Jurisdiction. Nothing in this Civil Case Management Plan and Scheduling Order shall be deemed a waiver of any Defendant's rights under Local Rule 9013-1(f) or other jurisdictional objections.

9. Modification. The parties may modify any provision hereof on written agreement or, absent such agreement, by seeking an order of the Court upon good cause shown.

10. The proposed joint pretrial order shall be submitted on ECF in accordance with Federal Rule of Civil Procedure 26(a)(3) (BR 7026) no later than _____.

11. Trial. The trial of this matter shall begin on _____.

12. Counsel for the Plaintiffs:

Rafael X. Zahralddin-Aravena
LEWIS BRISBOIS BISGAARD & SMITH, LLP
550 E. Swedesford Road, Suite 270
Wayne, PA 19087
Telephone: (302) 985-6000
Facsimile: (302) 985-6001
Rafael.Zahralddin@lewisbrisbois.com

-and-

Bennett G. Fisher (*pro hac vice*)
LEWIS BRISBOIS BISGAARD & SMITH, LLP
24 Greenway Plaza #1400
Houston, TX 77046
Telephone: (346) 241-4095
Facsimile: (713) 759-6830
Bennett.Fisher@lewisbrisbois.com

-and-

Keith Kodosky
LEWIS BRISBOIS BISGAARD & SMITH, LLP
600 Peachtree Street, NE, Suite 4700
Atlanta, GA 30308
Telephone: (404) 991-2183
Facsimile: (404) 467-8845
Keith.Kodosky@lewisbrisbois.com

Admitted *pro hac vice*

Counsel to the Debtors

Dated: October __, 2023

Magdeline D. Coleman
Chief United States Bankruptcy Judge